Attorney Docket No.: 1033-LB1031

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# REMARKS

## 35 U.S.C. §112, First Paragraph Rejections

The Office has rejected claims 1-13 and 35-37, at paragraphs 3-6 of the Final Office Action, under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicant respectfully submits that the amendments to claims 1, 35, and 37 overcome the 35 U.S.C. §112, first paragraph rejections.

### Claims 1, 32, and 35-37 are Allowable

The Office has rejected claims 1, 32, and 35-37, at paragraphs 7 and 8 of the Final Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent Application Publication No. 2004/0141596 ("Crockett") in view of U.S. Patent Application Publication No. 2003/0123618 ("Bhargava"). Applicant respectfully traverses the rejections.

None of the cited references, including Crockett and Bhargava, disclose or suggest the specific combination of claim 1. For example, as acknowledged on page 5 of the Final Office Action, Crockett does not disclose or suggest converting data received from a remote enterprise information system via a public network from an enterprise format to a common data format suitable to construct a voice directory, as recited in claim 1. Further, Bhargava does not disclose or suggest a data processor that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. In contrast to claim 1, Bhargava discloses pre-stored voice grammars that span all possible contexts for different data sources and voice repositories. (See Bhargava, paragraph [0034]). Bharagava does not disclose a data processor that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. Rather, Bhargava discloses using any number of predefined grammars to access information from a variety of sources and orally communicating information after being converted from a particular data source format to Voice XML. Hence, claim 1 is allowable.

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Claim 32 depends from claim 1, which Applicant has shown to be allowable. Hence, Crockett and Bhargava fail to disclose at least one element of claim 32. Accordingly, claim 32 is also allowable, at least by virtue of its dependency from claim 1.

Further, none of the cited references, including Crockett and Bhargava, disclose or suggest the specific combination of claim 35. For example, as explained previously, Crockett and Bhargava do not disclose or suggest a data processor that dynamically constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 35. Hence, claim 35 is allowable.

Claim 36 depends from claim 35, which Applicant has shown to be allowable. Hence, Crockett and Bhargava fail to disclose at least one element of claim 36. Accordingly, claim 36 is also allowable, at least by virtue of its dependency from claim 35.

Additionally, none of the cited references, including Crockett and Bhargava, disclose or suggest the specific combination of claim 37. For example, as explained previously, Crockett and Bhargava do not disclose or suggest a data processor that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 37. Hence, claim 37 is allowable.

#### Claims 1-13, 32, and 34 are Allowable

The Office has rejected claims 1-13, 32, and 34, at paragraph 9 of the Final Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent 6,956,848 ("Keung") in view of Crockett and further in view of Bhargava. Applicant respectfully traverses the rejections.

None of the cited references including Keung, Crockett, and Bhargava, disclose or suggest the specific combination of claim 1. For example, as acknowledged on page 10 of the Final Office Action, Keung does not disclose or suggest a data processor that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. Further, as explained previously, Crockett and Bhargava do not

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disclose or suggest a data processor that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. Hence, claim 1 is allowable.

Claims 2-9, 11-13, 32, and 34 depend from claim 1, which Applicant has shown to be allowable. Hence, Keung, Crockett, and Bhargava fail to disclose at least one element of each of claims 2-9, 11-13, 32, and 34. Accordingly, claims 2-9, 11-13, 32, and 34 are also allowable, at least by virtue of their dependency from claim 1.

### Claims 31 and 33 are Allowable

The Office has rejected claims 31 and 33, at paragraph 10 of the Final Office Action, as being unpatentable over Keung in view of Crockett and further in view of Bhargava and in view of U.S. Patent No. 6,999,930 ("Roberts"). Applicant respectfully traverses the rejections.

Claims 31 and 33 depend from claim 1, which Applicant has shown to be allowable. Roberts does not disclose or suggest the elements of claim 1 that are not disclosed or suggested by Keung, Crockett, and Bhargava. In particular, Roberts does not disclose or suggest a data connector that converts data from an enterprise data format to a common data format and a data processor coupled to the data connector that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. In contrast to claim 1, Roberts discloses voice XML scripts that specify an unstructured grammar where the grammar has been generated using data entries in fields of databases. (See Roberts, col. 5, ll. 42-46 and col. 7, ll. 38-42). Further, Roberts discloses a server sending a request to access information in a database in a format compatible with the database. (See Roberts col. 11, ll. 40-45). Roberts does not disclose a data connector that converts data from an enterprise data format to a common data format and a data processor coupled to the data connector that constructs grammars from data that has been converted from an enterprise data format to a common data format, as recited in claim 1. Hence, claims 31 and 33 are allowable at least by virtue of their dependency from claim 1.

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#### CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

5-1-2007 Date

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